

Ryan Hickman

Henderson, NV 89012

Clerk of the Court

Superior Court of Nevada

Yuga Labs, Inc. v. Ripples, et al.

2:23-cv-00010-APG-NJK

Yuga Labs, Inc v. Ryan Hickman

2:23-cv-00111-JCM-NJK

Dear Clerk,

I am writing to express my grave concerns regarding the harassment that I have been subjected to by a desperate law firm, Fenwick and West and their client Yuga Labs who is abusing the law to intimidate me, a citizen who is representing myself pro se. Despite providing all the materials requested by the firm and compelled by the judge, the firm continues to harass and intimidate me, making false allegations of contempt.

The actions of this law firm, Fenwick and West are completely unacceptable and have caused me great distress. I have had multiple zoom meetings with them all through the end of March 2023, providing additional materials beyond the requested scope. However, instead of acknowledging my cooperation, they have taken an extreme position to say that I am in contempt of court. Furthermore, the firm has gone to great lengths to file affidavits for service that I have never received, and left stacks of papers to blow away in the wind on my sidewalk, which I have video footage of from my front door camera. Exhibit 1. Further in the video

footage transcription the process server states “I can’t give this to you, so I will put it right here on the ledge.”

Fenwick and West is threatening me with a perjured affidavit.

Fenwick and West is threatening me by attempting to enter an injunctive relief similar to Thomas Lehman's case, directly related to this matter, which they have requested me to produce all non-public communications with Jeremy Cahen and Ryder Ripps without redaction or limitation and they would only then waive its right to seek monetary relief from me and that they would not seek civil contempt against me.

By making this threat, Fenwick and West is essentially forcing me to agree to their demands or risk facing default judgment, which could result in severe financial penalties and injunctive relief. This is a clear attempt to intimidate and coerce me into complying with their demands, even though I have no additional materials beyond what I have already provided and am not willing to manufacture evidence or falsify information as I have stated to them. Exhibit 2.

I submitted materials (see attached) explaining to Fenwick and West that while my deposition suggested the possibility of conversations with Jeremy Cahen & Ryder Ripps, those conversations were not in the context of the document request. Nonetheless I still submitted the materials. The materials did not contain any of the specific search terms the Court asked for, nor did it contain the additional search criteria that Fenwick and West asked me to go above and beyond to look for, which I did.

This type of behavior is highly unethical and goes against the principles of fairness and justice in the legal system. It is essential that I take appropriate action to protect my rights and ensure that I am not unfairly targeted by Fenwick and West / Yuga Labs.

I request your support and immediate relief from these egregious actions taken by this law firm. As a pro se litigant, I am entitled to the same protections and respect as those who have legal representation. This firm's actions have not only violated my rights as a litigant, but they have also undermined the integrity of our justice system.

These litigation tactics undermine the court and are designed solely to inflict punitive measures upon critics through the use of weaponized legal tactics and imposing extreme financial burdens.

Respectfully speaking this company represented by Fenwick and West, in the matter of this litigation; Yuga Labs, is under investigation for other financial crimes, directly associated by way of investment and market manipulation to the largest crypto currency fraud litigation (FTX). It is unjust to burden me, a US Citizen with false information or in attempts to convince me to perjure myself. It is not new for Fenwick and West to attempt this. When I was originally served a subpoena to provide these documents, I was given 21 days to respond. On September 9, 2022 I was served. This was stated by Fenwick and West attorney Anthony Fares. On September 27, 2022, 18 days after service, Mr. Fares had already declared that I was in contempt (Exhibit 3). This is a continued pattern of Fenwick and West.

I would like to bring to your attention that this case is currently being adjudicated in another state, which creates undue hardship for me. I am facing significant financial burdens as a result of this behavior. This results in an unfair advantage for Yuga Labs, who has greater resources to cover these costs. Additionally, it is important to note that pursuing legal action in different states may be seen as predatory behavior by the Fenwick and West. This strategy has been used to take advantage of my lack of knowledge or familiarity with the laws and court system of the other state. I urge the court to consider these factors when determining an appropriate course of action in this case.

I've spoken to several litigation attorneys with respect to representing me in this matter. No attorney would represent me for less than \$500k. As I've testified under oath in deposition, as well as its documented by exhibits in the case, I did not receive any money for assisting in this protest. The cost of litigation is prohibitively high, making it difficult to obtain good representation, making it a significant financial burden to seek justice. In light of this, it is important for the court to consider the financial burden of litigation when determining appropriate legal remedies. Ideally the court can help ensure that all parties have access to fair and just legal proceedings, regardless of their financial means.

I urge you to investigate this matter thoroughly and to take appropriate action against the offending law firm. The court must send a clear message that such conduct will not be tolerated and that pro se litigants will be afforded the same protections and respect as those who have legal representation.

Thank you for your attention to this matter. I trust that you will take the necessary steps to address this serious issue.

Sincerely,

Ryan Hickman

Exhibit 1



Exhibit 2

 **Kimberly Culp**
to Marti, me, Eric ▾

Wed, Mar 29, 12:33 PM ⭐ ← ⋮

Mr. Hickman – As I told you on Friday, we needed to receive your further compliance with the Court's February 14 order "immediately" in order to proceed with your deposition this Friday, March 31, and avoid a motion for contempt. We have not received the documents we discussed last week that we also told you were necessary for us to receive in order to proceed with your deposition and avoid seeking the Court's intervention. Again, yesterday, I reminded you that timing was important and stated that we needed to receive your documents by noon today. I have received no response, no update on the status of your production, and no documents. The documents you are withholding – those with Msrs. Rripps and Cahen – are critical to our case and you have testified that they exist or we know they do because (although Msrs. Rripps and Cahen also inappropriately withhold documents) we have seen evidence of further communications that you appear to be withholding.

We are canceling your deposition and will ask the Court to find you in contempt.

Regards,
Kimberly

Kimberly Culp
Fenwick | Counsel | +1 650-335-7138 | kculp@fenwick.com | Admitted to practice in California.
...

 **Ryan Hickman** <kingsrborn@gmail.com>
to Kimberly, Marti, Eric ▾

Wed, Mar 29, 2:17 PM ⭐ ← ⋮

I responded to the other email thread.
As I stated, I do not have other relevant documents. The communications that exist have absolutely nothing to do with this case. I am not withholding any communications that you nor the Court specifically asked for. As I testified in my deposition, one of the services I use on occasion, Telegram, is ephemeral -- which is the default function of that platform. Again, I cannot manufacture documents that do not exist.

Please see the other thread.

Ryan Hickman
"Everything you do matters"
...

Exhibit 3

Yuga Labs, Inc. v. Ripps, et al., Case No. 2:22-cv-04355-
JFW-JEM (C.D. Cal.) ➤ Inbox x



A

Anthony Fares <AFares@fenwick.com>
to me, Kimberly ▾

Tue, Sep 27, 2022, 7:35 AM

☆ ↵ ⋮

Dear Mr. Hickman,

Pursuant to the Subpoena to Produce Documents relating to *Yuga Labs, Inc. v. Ripps, et al.*, Case No. 2:22-cv-04355-JFW-JEM (C.D. Cal.) and personally served on you on September 9, 2022, you were commanded to produce requested documents and information, or serve written objections to the requests, by September 23, 2022. We have not received any objections or any of the requested documents or information from you, and it is our position that you are now in contempt. Please let me know whether you plan to comply with the subpoena. If you need more time, I am open to discussing an extension of your deadline to respond.

Likewise, as mentioned in our original letter correspondence to you, if you have any questions about the subpoena, please let us know, and we will confer with you about the requests in the subpoena.

Nothing in this communication should be construed as a waiver of any of Yuga Labs' rights, which Yuga Labs fully reserves. Additionally, nothing in this communication should be construed as legal advice.

Thank you,
Tony

Tony Fares

Fenwick | Associate | +1 415-875-2261 | afares@fenwick.com | Admitted to practice in California.
